

Petrazzi Transcript

Salvatore Petrazzi

Page 7

1 Petrazzi

2 A. A number of years, yes.

3 Q. What is your relationship with her?

4 A. She used to be a customer of mine,
5 and then I told Jack that she would be a good
6 person to hire, and he did.

7 Q. Now, during the time that you were
8 employed at New Roc, did you ever observe or
9 overhear Mr. Meskunas make any comments
10 about --

11 MR. MURPHY: Objection.

12 Q. -- Ms. Loscalzo?

13 MR. MURPHY: Leading. Objection.

14 Q. That's okay. Answer the question.

15 A. No.

16 Q. You never heard him say anything
17 about her?

18 A. No.

19 Q. Did you ever hear him make any
20 comments about her physical anatomy?

21 A. No.

22 Q. Did you ever hear him make any
23 comments about anyone else's physical
24 anatomy?

25 A. Not -- not that I'm aware of. I

Salvatore Petrazzi

Page 8

1 Petrazzi

2 was in the service department. That's at the
3 opposite end of the store.

4 Q. Well, that doesn't matter where you
5 were. I'm asking whether you ever heard
6 this.

7 A. No.

8 Q. Did you ever tell Ms. Loscalzo that
9 you had heard him make, Mr. Meskunas make
10 comments about her?

11 MR. MURPHY: I'm sorry. Could you
12 close the door. I was distracted by the
13 phone. And I'm going to ask you to
14 repeat it.

15 (Discussion off the record.)

16 (Recess taken from 10:45 a.m. to
17 10:54 a.m.)

18 (Record read.)

19 A. No.

20 Q. Did she ever ask you whether he
21 did?

22 A. She asked me on a couple of times,
23 and I said I didn't hear anything.

24 Q. Do you remember talking to me
25 several months ago?

Salvatore Petrazzi

Page 11

1 Petrazzi

2 sexual nature or anything like that toward
3 Micki. Not toward me, not to me or while I
4 was there. Now, if he said that while I
5 wasn't there, I couldn't answer that.

6 Q. You said you wanted to come in and
7 clear up a couple of things. What did you
8 want to clear up?

9 A. Just that I wasn't aware of what
10 Micki was talking about.

11 Q. So in the entire time you worked at
12 New Roc, you never heard Mr. Meskunas make
13 any remarks about body parts of female
14 employees?

15 A. No.

16 Q. And you say you never told
17 Ms. Loscalzo that you had overheard that?

18 A. Right.

19 Q. When is the last time you spoke to
20 Mr. Meskunas?

21 A. Last time I spoke to Jack was
22 January 5th, 1997, was when I left.

23 Q. And you haven't spoken to him or
24 anybody connected with him regarding this
25 deposition today?

Salvatore Petrazzi

Page 12

1 Petrazzi

2 A. No.

3 Q. Did you ever observe an incident
4 with Mr. Meskunas when he was sitting on a
5 motorcycle in the showroom and he asked
6 Ms. Loscalzo to get on the back seat?

7 A. No.

8 Q. You didn't see that either. Do you
9 know who Anthony DeSimone is?

10 A. Anthony DeSimone. No. Maybe if I
11 see him, I'd know him, but...

12 Q. Do you know who Al Griffo is?

13 A. Who?

14 Q. Al Griffo?

15 A. Al Griffo. As I said, you know, if
16 I -- no.

17 Q. And if I tell you that they said
18 that you were present during the incident in
19 which Mr. Meskunas told Ms. Loscalzo to get
20 on the back of the motorcycle, does that
21 refresh your recollection?

22 A. No.

23 MR. MURPHY: Objection.

24 Q. Huh?

25 A. No.

Salvatore Petrazzi

Page 13

1 Petrazzi

2 Q. Anything wrong with your
3 recollection, by the way?

4 A. Not at all.

5 Q. Are you taking any medication today

6 --

7 A. No.

8 Q. -- that would affect you?

9 A. No.

10 Q. No?

11 A. No.

12 MR. BERNBACH: Okay. That's it.

13 You're done.

14 MR. MURPHY: I have a question.

15 MR. BERNBACH: Okay. Go ahead.

16 EXAMINATION BY

17 MR. MURPHY:

18 Q. Did you ever tell Mr. Bernbach on
19 the telephone when he interviewed you that
20 you heard Mr. Meskunas make any statements?

21 A. No.

22 Q. Did you ever tell Mr. Bernbach when
23 he interviewed you on the telephone that you
24 observed Mr. Meskunas on the motorcycle?

25 A. No.

Sforza Transcript

DEPOSITION OF WAYNE SFORZA

Page 36

Sforza

1
2 unsatisfactory?

3 A. Her product knowledge was severely
4 lacking.

5 Q. When you say product knowledge what
6 are you talking?

7 A. Product knowledge. She's selling
8 Harley Davidson motorcycles and she did not have
9 the knowledge of the product to properly explain
10 to the customers.

11 Q. Okay. Were you aware that she had
12 never sold Harley Davidson motorcycles prior to
13 the time she was hired by New Roc Motorcycles?

14 A. Yes.

15 Q. Did you do anything to improve her
16 knowledge?

17 A. Yes.

18 Q. What did you do?

19 A. I instructed her to take the on-line
20 courses on Harley Davidson University.

21 Q. Did you tell her which ones?

22 A. Yes, I actually signed her up for
23 some of them.

24 Q. Did she take them?

25 A. No.

DEPOSITION OF WAYNE SFORZA

Page 37

Sforza

1 Q. She didn't take any of them?

2 A. As far as I know.

3 Q. Was she provided with any course
4 materials?

5 A. They were all on the computer.

6 Q. How do you know that?

7 A. Because I've taken them myself.

8 Q. Okay. So you told her to take the
9 courses and she never took any?

10 A. Correct.

11 Q. All right. Did you counsel her about
12 that?

13 A. Yes.

14 Q. Did you put that in writing?

15 A. No.

16 Q. Okay. I may have asked you this, but
17 bear with me, if you will, how did you determine
18 which deficiencies we'll call them warranted
19 write-ups?

20 A. They were what I considered serious
21 deficiencies.

22 Q. So the others weren't serious?

23 A. Well, they were serious but not as
24 serious.
25